

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

CHAMBER OF COMMERCE OF
THE UNITED STATES OF
AMERICA; FORT WORTH
CHAMBER OF COMMERCE;
LONGVIEW CHAMBER OF
COMMERCE; AMERICAN
BANKERS ASSOCIATION;
CONSUMER BANKERS
ASSOCIATION; and TEXAS
ASSOCIATION OF BUSINESS,

Plaintiffs,

v.

CONSUMER FINANCIAL PROTECTION
BUREAU; and ROHIT CHOPRA, in his
official capacity as Director of the Consumer
Financial Protection Bureau,

Defendants.

Case No. 4:24-cv-00213-P

**SUPPLEMENTAL APPENDIX
TO PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Document	Page
Second Declaration of Steve Montgomery	Supp. App'x 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

CHAMBER OF COMMERCE OF
THE UNITED STATES OF
AMERICA; FORT WORTH
CHAMBER OF COMMERCE;
LONGVIEW CHAMBER OF
COMMERCE; AMERICAN
BANKERS ASSOCIATION;
CONSUMER BANKERS
ASSOCIATION; and TEXAS
ASSOCIATION OF BUSINESS,

Plaintiffs,

v.

CONSUMER FINANCIAL PROTECTION
BUREAU; and ROHIT CHOPRA, in his
official capacity as Director of the Consumer
Financial Protection Bureau,

Defendants.

Case No. 4:24-cv-00213-O

**SUPPLEMENTAL DECLARATION
OF STEVE MONTGOMERY IN
SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

DECLARATION OF STEVE MONTGOMERY

I, Steve Montgomery, declare as follows:

1. I am the President and CEO of the Fort Worth Chamber of Commerce ("FWC"). In that capacity, I oversee all of FWC's operations. FWC brings the region together to identify issues, solve problems, and help align resources resulting in a stronger business climate and greater economic prosperity.
2. The purpose of this declaration is to provide supplemental information related to the effect on the Fort Worth Chamber's members of a new rule announced by the CFPB pertaining to "Credit Card Penalty Fees," Credit Card Penalty Fees, Final Rule, available at

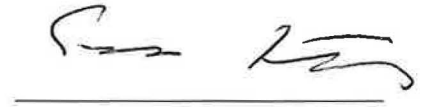
https://files.consumerfinance.gov/f/documents/cfpb_credit-card-penalty-fees_final-rule_2024-01.pdf.

3. Unless otherwise stated, this Declaration is based upon my personal knowledge and belief and/or upon my review of business records of FWC. If called as a witness, I could and would testify competently thereto.

4. Synchrony Financial, and its subsidiary Synchrony Bank, are and have been members in good standing of FWC since before the final rule was issued and this litigation commenced. Synchrony Bank was inadvertently omitted from our online membership directory.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of March 2024, at FORT WORTH, TEXAS.

A handwritten signature in black ink, appearing to read "Steve Montgomery", is written above a horizontal line.

Steve Montgomery